

July 14, 2006

Office of the Secretary
Federal Trade Commission
Room H-135 (Annex W)
600 Pennsylvania Ave., N.W.
Washington, D.C. 20580

RE: Business Opportunity Rule, R511993

Dear FTC Commissioners:

My name is John Sanders I am an African-America independent contractor business owner through Primerica Financial Services. I live and work in Jackson, Mississippi. I have a resident life insurance license in Mississippi and non-resident life insurance licenses in Alabama, California, Georgia, Illinois, Indiana, Kansas, Louisiana, Missouri, New York, Tennessee and Texas. I also have Series 6, 26 and 63 securities licenses through the National Association of Securities Dealers (NASD).

Prior to joining Primerica in 1980, I played professional football in the National Football League with the New England Patriots and the Philadelphia Eagles. After professional football, I was looking for an opportunity to go into business for myself that would afford me the freedom and economic opportunities that I had enjoyed as a member of the National Football League. Being an independent business owner has been a blessing to me, my family and, I hope, the communities that I serve. I can vividly recall that one of my first insurance sales involved a young family man that had \$10,000 in life insurance coverage at time I introduced him to Primerica. To this day, it makes me feel good to know that because of my independent business through Primerica, that at the time of this young man's untimely death, I was able to deliver his family a death benefit check for 10 times the amount he initially had in coverage at a lower cost. Today my wife and I are able to render volunteer time to service organizations in our community because the Primerica business foundation is real and because it works. On a more personal level, all four of my sons are also pursuing careers through the Primerica business. I have three sons who are presently actively engaged in the business. My youngest son, Justin, who is attending the University of Illinois on full athletic scholarship, has his insurance license and intends to become actively engaged in the future.

I am writing this letter to express my opposition to the FTC's proposed rule on business opportunities, as presently worded. While the 7-day waiting period may be a justified as a deterrent against true fraud schemes, it is unnecessary for companies like Primerica who are heavily regulated by both federal and state agencies. Similarly, requiring me to disclose the fact that lawsuits have been filed against other affiliated businesses, unrelated to my independent business, seems unfair and without any basis. Also, as an independent contractor, I am responsible for the expenses incurred in operating my business. Therefore, the 10 reference requirement of the proposed rule will significantly increase my cost of doing business because I will somehow always need to know who lives where and when they were recruited, even if they are not a part of my own organization.

While I certainly agree that the FTC should do all it can to prevent deceptive and unfair business practices, I disagree with many aspects of the proposed rule and thus I am opposed to it in its current draft; mainly, because I believe it will most severely impact those members of my organization who do the business on a part-time basis. I have over 800 part-time associates in my organization. Application of the proposed rule should not serve as roadblock to hardworking families, who require the ability to earn extra income through part-time work. Thank you for the opportunity to give comment on this important proposed rule.

Sincerely,

John Sanders